I wish to comment on the above mentioned docket. In general cell phone manufacturers and mobile communications providers and manufacturers have NOT worked to make their products and services accessible to persons who happen to be blind or be unable to read visual displays. Please see below.

I use a variety of cell phone products as well as assisting others to procure them as part of a device called the KnfbReader Mobile. Other than the Apple iPhone which as yet does not support the KnfbReader Mobile cell phones with any kind of accessibility costs persons who cannot read their displays significantly more due to the need to purchase a special screen reader to access information on these devices.

I have had the opportunity to speak with several cellular phone manufacturers concerning the lack of access to their products. Thus far these manufacturers have NOT worked in any significant way to resolve any lack of access to their products. In addition stores such as the Nokia Store and most cell phone manufacturer's web sites are not accessible.

Even Apple which has put significant access into their iPhone does not provide for any assurance that any of the 250,000 apps now available for the iPhone are accessible.

Further observations are below. I urge the FCC to resolve this issue soon in order that persons who cannot use visual displays have the same access to mobile communication devices as persons who use visual systems.

###Microsoft Windows Phone 7 Inaccessible To the Blind *Are you aware that in October 2010 Microsoft will release a platform called Windows Phone 7 This platform strives to compete with the likes of Apple iOS eg iPhones, Blackberry devices, Android devices, etc. Microsoft has indicated that Windows Phone 7 will not have out-of-the-box accessibility, and furthermore, it has not been developed in such a way as to allow 3rd party access technology screen reader developers, like CodeFactory or Nuance, to add accessibility to the platform. The net result is that blind Americans will be excluded from the opportunity to participate and experience Windows Phone 7. I urge the FCC to take enforcement action against Microsoft for its fflagrant disregard and negligent behavior as it relates to nonvisual access for people who are blind, or deaf blind in the development of this operating

system and related hardware devices.
###Relaxed Apple App Development Standards May Cause Accessibility To Decrease
*In September 2010, Apple significantly relaxed restrictions in place as to what software development tools can be used to produce so-called iOS applications. The prior in place required software development tools largely had out-of-the-box accessibility components such that most applications would work with VoiceOver via speech or refreshable Braille. Among other tools, Apple will now allow Adobe Flash as a development platform for makers of applications. I suggest that the FCC mandate accessibility with in current and emerging so-called application stores or marketplaces. All major platforms have these marketplaces including Apple, Android, BlackBerry, and likely Microsoft Windows Phone 7.

###Google, Device Manufacturers Turn Off Android Accessibility T-Mobile HTC
*Google allows mobile carriers to tweak and modify the operating system and user interface on Android handsets. Recently, T-Mobile in the US released an HTC Android cell phone. T-Mobile requested that HTC tweak the Android operating system such that the accessibility features were not available to consumers. These disservice consumers had to spend large amounts of time navigating the bureaucracy of the telecommunications mobile ecosystem, namely interfacing with T-Mobile and HTC. Neither T-Mobile or HTC addressed the accessibility shortcoming, and wireless carrier T-Mobile by its 1st level agents attempted to rigorously enforce contract terms on the disenfranchised class of consumers who were negatively impacted by the carrier and manufactuers lack of regard for blind and deaf blind Americans. The FCC could promulgate regulations to disallow carriers and device manufacturers from turning off accessibility features in the future. The FCC should also reprimand HTC and T-Mobile, and ensure that these entities follow the proposed regulations.
###Major Accessibility Issues On Nokia Devices *Nokia produces a number of handsets including the Nokia N86 which is one device that powers the KNFB Reader? Many aspects of the user experience on modern Nokia mobile phone handsets are inaccessible by nonvisual means. For example, when a blind or deaf blind consumer unboxes a device like a Nokia N86 from the factory, there is no nonvisual access to the setup procedure. Similarly, the PC Suite software which is essential to use the device fully has largely not been accessible to pc screen readers.
Nokia also has a store where consumers can buy applications and other media.

The store is not accessible even with 3rd party screen readers such as Talks or Mobile Speaks. Finally for a long time the email client on the Nokia N86 and similar devices was not accessible via nonvisual means. This meant that business professionals and consumers who are blind could not access key features of the phone that sighted users take for granted. Nokia has failed to address these major and substantial accessibility issues in their products. Nokia has been made aware of these issues, and has failed to substantively address these issues. The FCC should initiate an enforcement action against Nokia for its wantan, negligent, and flagrant disregard of blind, and deaf blind consumers who require nonvisual means to access these kinds of devices and platforms. Nokia has failed to either provide an out-of-box fully accessible platform such as the Apple model, and it has failed to work with 3rd party screen reader developers to ensure that blind and deaf blind consumers can fully utilize the devices.

###Google Android Accessibility
While some individuals have worked on nonvisual accessibility to Google Android devices, the devices remain largely inaccessible by typical blind consumers. Only savvy technology users have been able to gain access to parts of the Android experience. The nonvisual user experience has been articulated as similar to trying to access Lenux. Clearly the strategy that Google, carriers, and related device manufacturers have employed has nott produced a sufficient and meaningful nonvisual user experience. The FCC must compel Google, device manufacturers, and carriers to establish tangible accessibility to the Android platform quickly, and quickly doesn't mean 10 years from now.

###Do Blind People Just Want Access To Old and Boring Features?
It is worth noting that, sometimes, carriers and device manufacturers, including but not limited to Nokia, trumpet very basic accessibility features. For example, spoken caller id, or a phone speaking the numbers that a user dials. The fact is that blind and deaf blind consumers don't just want access to old and boring features that were standard in the year 1999. Blind and deaf blind consumers have an inherent civil right to enjoy the full breath and depth that current and future mobile phone platforms currently do and will offer in the future. This includes, but is not limited too, full nonvisual access to basic calling features, phone management, phone menus, full contact management, web browsing, application marketplaces, applications provided by carriers, applications provided by

3rd party developers, media consumption services provided by the 2 aformentioned provider groups, etc. Again, this is not an exhaustive list. The list may sound long, however, this is the access that the general public enjoys and frankly takes for granted. I want to update my Facebook status, Twitter status, share music and other media, download podcasts, produce podcasts, find nearby restaurants, and get walking directions just as much as I want to use the phone to make calls.
###How Nonvisual Mobile Device Accessibility Is Achievable This type of nonvisual accessibility is also achieveable. The reason we have not moved forward much since 1996 is that carriers and device manufacturers have failed to devote sufficient resources to nonvisual access to their products and services. The industry has made disingeneous claims that accessibility is not achievable. The entire telecommunications ecosystem has not embraced nonvisual access and accessibility in to their corporate culture and corporate DNA at every level of their organizations from the CEO, their research and development efforts, standars for device manufacturers, right down to entry level sales and service staff.

The telecommunications ecosystem and related industry should really take a page out of Apple's playbook. Apple is the only device manufacturer that I am aware of that takes accessibility seriously, and which provides consumers with a steady stream of positive innovations. Apple regularly and meaningfully participates in consumer and accessibility industry trade shows such as the National Federation of the Blind convention. The Boston Apple Store proactively reaches out to the blind community to foster a mutually beneficial positive relationship, and has devoted resources in its training programs who specialize in the built in VoiceOver nonvisual accessibility screen reading function. I often read that Apple hires accessibility engineers, testers, and others to ensure its products are accessible. Apple includes full nonvisual accessibility functions, not just a few old and boring basic features, in all its current iPhones at no additional cost to blind consumers! The National Federation of the Blind presented an award to Apple at our 2010 national convention for their trailblazing efforts in meaningfully and tangibly recognizing our technology civil rights. I can update my Facebook status, check in to FourSquare, buy music from iTunes, order a taxi electronically, look up and modify travel reservations, syncranize corporate Microsoft Exchange data, review nearby tweets on Twitter, or send a picture of something I need recognized to an innovative iOS application like OMobie. I can do all this because Apple takes

nonvisual accessibility seriously! However, there is not a fully accessible GPS system available for the IPhone. AT&T Navigator provides some accessible features but many of the buttons and features are not accessible. I have contacted the manufacturer of AT&T's product, Telenav, but my comments and suggestions have been ignored thus far.

Other developments that the FCC can consider as proof of concept that full nonvisual accessibility is achieveable include but are not limited to closed captioning in televisions, the wide deployment of talking automatic teller machines, and the use of nonvisual accessible Kiosks at Amtrak which like an ATM provide a spoken user interface for blind consumers.

Thank you for your consideration of my comments.